

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-60126-LEIBOWITZ/AGUSTIN-BIRCH

UNITED STATES OF AMERICA,

Vs.

JANICE ELEANOR TURNER and
KISEAN PAUL ANDERSON, a/k/a
SEAN KINGSTON,
Defendants.

/

DEFENDANTS' UNOPPOSED MOTION TO TRAVEL

COME NOW the Defendants, JANICE TURNER and KISEAN ANDERSON a/k/a SEAN KINGSTON, and file this unopposed motion to travel and allege the following facts:

1. The Defendants are charged by indictment returned on July 11th, 2024 with wire fraud.
2. The Defendants have a pending legal matter in Los Angeles, California which predated the charges in the instant indictment.
3. The Defendants seek this Honorable Court's permission to travel to Los Angeles, California to handle the pending legal matter.
4. It is anticipated that the trip to Los Angeles, California will not take more than three (3) days, two (2) days of which involves travel days to and from Los Angeles.
5. Counsel for Mr. Anderson has spoken to pretrial officer, Tanya Okun, (305-801-4313) who has stated she has no objection to the Defendants travel to Los Angeles, California for this purpose. Counsel has also spoken to AUSA Marc S. Anton, who does not oppose this motion. We thank both for their professional courtesy.

6. It is anticipated that the Defendants would need to travel from Broward County, Florida no later than November 25th, 2024.

7. The Defendants will advise pretrial services of their itinerary and return date.

WHEREFORE, Defendants seek an order from this Honorable Court granting this unopposed motion to travel departing on or about November 25th, 2024.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with viia e-portal and copied to: Marc S. Anton, AUSA, 500 East Broward Blvd., Suite 700, Ft. Lauderdale, Fl 33394, marc.anton@usdoj.gov and Tanya Okun at: tanya_okun@flsp.uscourts.gov this 20th day of November, 2024.

Respectfully Submitted,

/s/: ROBERT A. ROSENBLATT
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